

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Magistrate No.
	)	[UNDER SEAL]
JOHN VILORIA; BARRY ROBERT	)	
YOUNGER, JR.; CHERYL LEIGH JOHNSON;	)	
AND ERIC SEIGHMAN	)	

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Mark Kernan, Special Agent of the United States Secret Service,  
being duly sworn, do depose and state as follows:

**I. Introduction**

1. I am a Special Agent with the United States Secret Service and have served as a Special Agent for the past seven years. I am currently assigned to the Pittsburgh Field Office and am trained and authorized to investigate the offenses alleged herein. I have received training in the preparation, presentation and service of criminal complaints and arrest and search warrants. As part of my duties as a Special Agent, I have conducted numerous financial investigations involving counterfeit and fictitious obligations, including counterfeit Federal Reserve Notes, concerning violations of Title 18, United States Code, Sections 371, 471, 472, and 473.
2. As a federal agent, I am authorized to investigate violations of laws of the United States and am a law enforcement officer with the authority to execute warrants issued under the authority of the United States.
3. I make this Affidavit in support of a Criminal Complaint against John Viloria (Viloria), Barry Robert Younger, Jr. (Younger), Cheryl Leigh

Johnson (Johnson), and Eric Seighman (Seighman), who are collectively referred to herein as the defendants.

4. This Affidavit establishes probable cause to believe that from on or about July 1, 2014, and continuing thereafter until on or about July 28, 2014, the defendants knowingly and willfully conspired, combined, confederated and agreed to commit offenses against the United States, that is, (a) with the intent to defraud, possessed and concealed falsely made, forged, counterfeited and altered Federal Reserve Notes in the denomination of \$100 dollars, which the defendants knew to be falsely made, forged, counterfeited and altered, in violation of Title 18, United States Code, Section 472; and (b) with the intent to defraud, passed, uttered and published to and upon retail business establishments, falsely made, forged, counterfeited and altered Federal Reserve notes in the denomination of \$100 dollars, which the defendants knew to be falsely made, forged, counterfeited and altered, in violation of Title 18, United States Code, Section 472, and did commit one of more overt acts in furtherance of the conspiracy, in violation of Title 18, United States Code, Section 371.
5. The statements contained in this Affidavit are based on information gathered by me; my personal knowledge, observations, experience and training; review of documents, videos and records; information provided to me by other law enforcement officers; and from other sources as outlined herein.
6. This Affidavit is in support of a Criminal Complaint against the defendants. As such, I have not set forth all of my knowledge about this investigation. Rather, I have set forth only those facts necessary to establish probable cause for the Criminal Complaint.

## II. Factual Summary

7. On July 14, 2014, your affiant and PA State Trooper Joseph Panepinto of the Organized Crime Unit responded to the Pennsylvania State Police Uniontown barracks located at 1070 Eberly Way, Lemont Furnace, PA 15456 regarding Seighman attempting to pass a counterfeit \$100 Federal Reserve Note at Pechin Grocery located at 300 Laurel Way, Connellsville, Pennsylvania 15042.
8. Seighman was read his Miranda warnings and he agreed to answer questions and make statements. According to Seighman, he received the counterfeit \$100 Federal Reserve Note from a friend of his named Barry Youger. Seighman stated that he and Youger have known each other for approximately ten years and have passed counterfeit \$100 Federal Reserve Notes at retail stores in the Western District of Pennsylvania to include Walmart, Radio Shack, Giant Eagle Grocery Stores, gas stations, Pet Smart, Home Depot, Lowes, Kohl's, Game Stop, Sheetz, Sears, and retailers at the Uniontown Mall, Tanger Outlets, and Century III Mall, respectively.
9. Seighman also told your affiant that Youger receives the counterfeit currency from a person in New York City, but that Seighman doesn't know who this person is or where Youger meets with him to receive the counterfeit currency. Seighman advised that he and Youger both purchase small dollar items with counterfeit \$100 Federal Reserve Notes at retail stores for the purpose of receiving large amounts of genuine currency in change. Seighman stated that he is compensated with two or three counterfeit \$100 Federal Reserve Notes and is permitted to keep what he purchases.
10. Seighman further told your affiant that he has successfully passed approximately \$2,000 in counterfeit currency at the aforementioned

retail stores in the Western District of Pennsylvania since early July 2014.

11. Your affiant interviewed Seighman on two other occasions during this investigation. During these conversations, Seighman stated that in early July 2014, Youger and Johnson arrived at his residence in a white Chevy Impala that belongs to Youger. Upon arrival, Johnson remained in the vehicle while Youger went into Seighman's house. Seighman and Youger then had a conversation concerning counterfeit currency. Seighman advised your affiant that Youger told him that Youger knew certain individuals who would provide them with counterfeit currency. Seighman stated that Youger also told him that this counterfeit currency is able to defeat the counterfeit detection pens as the bills are treated with hair care products (moose) and have false security features that will assist with deceiving retail store employees. Seighman provided other information to your affiant that your affiant determined to be false, which information is not being used by your affiant herein.
12. As part of the investigation, your affiant reviewed bank reports concerning counterfeit currency. Bank reports, also known as SSF 1604s, are completed by financial institutions after receiving counterfeit currency from an individual or business as a result of suspected deposit(s). The counterfeit currency associated with the deposit(s), are attached to the bank report which provides the name, address, telephone number of the business that made the deposit, the date the deposit was made, information about the counterfeit currency (serial number, series year, back plate, front plate), and other information. The bank reports, along with the counterfeit currency, are forwarded to the appropriate U.S. Secret Service Field Office for review.

13. Your affiant contacted several retail stores in the Western District of Pennsylvania where Seighman and Youger were suspected of passing the counterfeit \$100 Federal Reserve Notes. Your affiant provided retail store managers and loss prevention personnel with the deposit dates that were recorded on the bank reports. Based on the deposit date, the retail stores were able to determine the date and time of the original sale that resulted in the receipt of the counterfeit currency. The retail stores also searched the sales journal isolating cash transactions that were tendered with \$100 bills and that resulted in a large amount of change returned to the customer(s) in the amounts of \$80.00-\$95.00.
14. As a result of this procedure, your affiant reviewed surveillance videos corresponding with the type of cash transactions mentioned above that depicted Seighman and Youger purchasing small dollar items with counterfeit \$100 Federal Reserve Notes resulting in the receipt of a large amount of genuine currency in change at the following retail stores and on the dates indicated below:
  - (a) on July 8, 2014, at Sheetz located at 4700 SR 51 South, Belle Vernon, PA 15012;
  - (b) on July 8, 2014, at the Shop N' Save located at 4927 SR 51, Belle Vernon, PA 15012;
  - (c) on July 14, 2014, at Sheetz located at 1002 West Crawford Avenue, Connellsville, PA 15425;
  - (d) on July 14, 2014, at the Marathon gas station located at 1310 Morrell Avenue, Connellsville, PA 15425; and
  - (e) On July 14, 2014, at KMART located at 99 Matthew Drive, Uniontown, PA 15401.
15. In addition, Seighman is depicted on surveillance video passing counterfeit \$100 Federal Reserve Notes in July 2014 at the following retail businesses:

(a) on July 8, 2014, at Burlington located at 3000 Mountainview Drive, West Mifflin, PA 15122;

(b) on July 12, 2014 at Marshall's located at 1500 Chestnut Street, Washington Crown Center Mall, Washington, PA; and

(c) on July 14, 2014, at Lowes located at 79 Matthew Drive, Uniontown, PA 15401.

16. As the investigation continued, your affiant was contacted by a Confidential Informant, hereafter referred to as CI, from another law enforcement agency. The CI is known by law enforcement to be reliable. The CI provided information regarding the counterfeiting operation involving Seighman and Youger, which information was independently verified as reliable as outlined below.
17. On July 23, 2014, the CI met with your affiant and stated that Youger and Seighman receive counterfeit currency from a person from New York named "Stackz". The CI described "Stackz" as a black male, approximately 6' tall, and weighing approximately 240-250 pounds. The CI also stated that when "Stackz" arrives in the Pittsburgh area, he stays at Seighman's residence in Charleroi, Pennsylvania. The CI continued stating that "Stackz" provides Youger and Seighman with the counterfeit currency to spend at the retail stores while he stays in the vehicle.
18. On July 28, 2014, the CI contacted your affiant and reported that Youger was planning to pick-up "Stackz" at the Greyhound bus station located at 55 11th Street, Pittsburgh, PA 15222 on this date at approximately 5:30 pm.
19. Based upon this information, agents from Secret Service Pittsburgh Field Office and detectives from the Pennsylvania State Police Organized Crime Unit conducted surveillance on July 28, 2014, at the Pittsburgh Greyhound bus station and observed Youger and Johnson

occupying a white Chevy Impala bearing Pennsylvania registration JNL-9961. Later, Youger, Johnson, and an unknown black male returned to the white Chevy Impala and departed the bus station.

20. The surveillance continued following these individuals to a Sunoco gas station located at 4071 Beechwood Blvd, Pittsburgh, PA 15012 where Special Agent Bill Steen of the Secret Service observed Youger exit the Sunoco and return to the white Chevy Impala. After the suspects departed, your affiant entered the Sunoco and met with employee Dylan Carothers. Your affiant asked Carothers if he recently received a \$100 Federal Reserve Note within the past few minutes from a customer. Carothers stated that he received a \$100 Federal Reserve Note from a white male (later identified as Youger) who was of average height and wearing a baseball style hat who paid for \$10.00 in gasoline with a \$100 Federal Reserve Note.
21. Your affiant examined the \$100 Federal Reserve Note bearing serial number AL80443244L, Check letter/Quadrant No. H3, Series Year 2006, Front Plate H18, and Back Plate 123. Based on your affiant's training, knowledge, and experience in counterfeit currency investigations, your affiant believed that the aforementioned \$100 Federal Reserve Notes was counterfeit because the security features were not consistent with genuine U.S. currency.
22. Your affiant informed the members of the surveillance team that Youger passed a counterfeit \$100 Federal Reserve Note at the Sunoco to purchase gasoline. The suspects were next observed at the Home Depot located at 3550 William Penn Highway, Pittsburgh, PA 15235. Detectives from the Pennsylvania State Police approached the suspects who were occupying the white Chevy Impala, identified themselves as law enforcement, and affected a state arrest on the suspects who were identified as Youger, Johnson and Vilorio.

23. A search incident to arrest by PA State Trooper David Calabro found Vilorio in possession of approximately \$6,700 in suspected counterfeit \$100 Federal Reserve Notes and approximately \$800 in genuine currency. Vilorio was placed inside of a Wilkins Township police cruiser located at the Home Depot parking lot and remained there until the U.S. Secret Service transported him to the Pennsylvania State Police barracks located in Moon, Pennsylvania.
24. Later, when Vilario was being removed from the Wilkins Township police cruiser and transferred into a Secret Service vehicle at the Home Depot parking lot for transport, Special Agent William Steen observed an object close to the feet of Vilorio and partially under the front passenger seat of the police cruiser. The object was a brown envelope containing approximately \$8,000 in suspected counterfeit \$100 Federal Reserve Notes.
25. Your affiant examined the \$6,700 in \$100 bills found on Vilorio's person and the \$8,000 in \$100 bills found at the feet of Vilorio in the Wilkins Township Police cruiser. Based on your affiant's training, knowledge, and experience in counterfeit investigations, your affiant believes that all \$14,700 in \$100 bills are counterfeit due to repeating serial numbers on several of the \$100 bills and since the paper and the security features are not consistent with genuine U.S. currency.
26. After the state arrest of Johnson, your affiant interviewed her at the Pennsylvania State Police barracks located in Moon, Pennsylvania. After Johnson was read her Miranda Warnings, she agreed to answer questions and make statements regarding the counterfeiting activity. Johnson told your affiant that the counterfeit currency was provided to her by Vilorio, also known as "Stackz". Johnson stated that she passed counterfeit \$100 Federal Reserve Notes on July 28, 2014, at a Sheetz gas station where she purchased \$10.00 in gasoline and at



a "Home Store" (later identified as Tuesday Morning) where she purchased a candle. Both of these retail stores are in close proximity to the Home Depot where Johnson, Youger and Vilorio were arrested by the PA State Police.

27. Between July 29, 2014 and July 31, 2014, your affiant received still photographs and sale receipts identifying Cheryl Johnson passing counterfeit \$100 Federal Reserve Notes at the following locations: (a) Shop N' Save located at 3335 William Penn Highway, Pittsburgh, PA 15235; (b) Sheetz located at 3457 William Penn Highway, Wilkins Township, PA 15235; and (c) Tuesday Morning located at 3430 William Penn Highway, Wilkins Township, PA 15235.
28. The surveillance videos for the above retail stores are not available as of this Affidavit, but were reviewed by agents of the Secret Service, who confirmed Johnson was in the videos. The surveillance videos and sale receipts are in the process of being provided to your affiant in the near future.


### **III. Conclusion**

29. I submit that this Affidavit provides probable cause to believe that from on or about July 1, 2014, and continuing thereafter until on or about July 28, 2014, the defendants knowingly and willfully conspired, combined, confederated and agreed to commit offenses against the United States, that is, (a) with the intent to defraud, possessed and concealed falsely made, forged, counterfeited and altered Federal Reserve notes in the denomination of \$100 dollars, which the defendants knew to be falsely made, forged, counterfeited and altered, in violation of Title 18, United States Code, Section 472; and (b) with the intent to defraud, passed, uttered and published to and upon retail business establishments, falsely made, forged, counterfeited and altered Federal Reserve notes in the denomination

of \$100 dollars, which the defendants knew to be falsely made, forged, counterfeited and altered, in violation of Title 18, United States Code, Section 472, and did commit one of more overt acts in furtherance of the conspiracy, in violation of Title 18, United States Code, Section 371.

30. Your affiant requests that warrants for the arrest of the defendants be issued.

The information contained in this Affidavit is true and correct to the best of my knowledge, information and belief.

  
Special Agent Mark Kernan  
United States Secret Service

Sworn and subscribed to before me  
this 4th day of August, 2014

  
Honorable Maureen P. Kelly  
United States Magistrate Judge